

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce all records of hours worked for each plaintiff, including the time of the beginning and ending of each workday, the beginning and ending of each meal period, and the total hours worked each pay period for each Plaintiff throughout the relevant time period.

REQUEST FOR PRODUCTION NO. 2:

Please produce all payroll records for each Plaintiff throughout the relevant time period. specifically detailing the calculation and payment of wages.

REQUEST FOR PRODUCTION NO. 3:

Please produce copies of all checks issued to the Plaintiffs during the relevant time period.

REQUEST FOR PRODUCTION NO. 4:

Please produce copies of any and all documents furnished to the Plaintiffs with each payment of wages.

REQUEST FOR PRODUCTION NO. 5:

Please produce all documents concerning the hiring of each plaintiff, including, but not limited to:

1. I-9 employment eligibility verification form (not required for volunteers, independent contractors, or unpaid interns)
2. W-4 federal tax collection form
3. IT-2104 New York state tax withholding form
4. Notice of Pay Rate as required by NYLL 195(1).

REQUEST FOR PRODUCTION NO. 6:

Please produce all documents concerning the separation from employment of each Plaintiff, including the reason(s) therefor.

REQUEST FOR PRODUCTION NO. 7:

Please produce all documents concerning any training provided to employees of Demarco Bros Landscaping & Tree Service Corp on wage and hour laws and regulations, regardless of date.

REQUEST FOR PRODUCTION NO. 8:

Please produce all documents concerning any policies or procedures implemented by Demarco Bros Landscaping & Tree Service Corp regarding wage and hour compliance regardless of date, pertaining to the payment of overtime premiums, issuance of wage statements, and issuing hiring notices.

REQUEST FOR PRODUCTION NO. 9:

Please produce all documents furnished to Oscar Cruz, Carlos Vasquez, Mynor Polanco, and German De Jesus Portillo at or about the time they were hired.

REQUEST FOR PRODUCTION NO. 10:

Please produce all communications concerning wage and hour compliance, regardless of date.

REQUEST FOR PRODUCTION NO. 11:

Please produce all communications between Edgardo Villalobos and the Plaintiffs, regardless of date.

REQUEST FOR PRODUCTION NO. 12:

Please produce all documents concerning any audits or inspections conducted by any government agency regarding wage and hour compliance at Demarco Bros Landscaping & Tree Service Corp, regardless of date.

REQUEST FOR PRODUCTION NO. 14:

Please produce all documents concerning any allegations of wage and hour claims against Demarco Bros Landscaping & Tree Service Corp specifically pertaining to unpaid wages, overtime violations, unpaid overtime, wage statement claims, and wage notice claims, regardless of date.

REQUEST FOR PRODUCTION NO. 13:

Please produce all documents concerning any settlements, judgments, or other resolutions of wage and hour claims against Demarco Bros Landscaping & Tree Service Corp specifically pertaining to unpaid wages, overtime violations, unpaid overtime, wage statement claims, and wage notice claims, regardless of date.